

## STATEMENT OF LEGAL AND FACTUAL BASIS

Wolverine Gasket Division, Eagle-Picher Industries, Inc.  
3175 State Street  
Blacksburg, Virginia 24060  
Permit No. VA-21240

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Wolverine Gasket Division, Eagle-Picher Industries has applied for a reopening of the Title V Operating Permit for its Cedar Run facility near Blacksburg, Virginia to add language regarding new MACT requirements and incorporate language changed in the underlying NSR permit to reflect modifications related to MACT compliance. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact:

Date: February 24, 2006

## **FACILITY INFORMATION**

### Permittee

Wolverine Gasket Division  
Eagle-Picher Industries, Inc.  
3175 State Street  
Blacksburg, VA 24060

### Facility

Wolverine Gasket Division  
Eagle-Picher Industries, Inc.  
3175 State Street  
Blacksburg, VA 24060

AIRS ID No. 51-121-0080

## **SOURCE DESCRIPTION**

SIC Code: 3053

This is a relatively new plant built in accordance with a April 11, 1995 state NSR air permit to construct and operate coating line 5 and a January 23, 2001 NSR permit for coating line 6. NSPS Subpart TT, Metal Coil Coating, applies to both coating lines, including all coil coating, drying/curing ovens, the two full time catalytic oxidizers/incinerators, and the thermal incinerator controlling all coating line emissions. The NSPS does not apply to coating line 5's boiler (CL5B) and coating line 6's boiler (CL6C) that fire gas, coating mixing/preparation equipment for coating lines 5 and 6 (CLMR) such as the coating mixing equipment or storage tanks or fuel burning (natural gas with standby propane).

MACT Subpart SSSS, Surface Coating of Metal Coil applies to coating line 5 as an existing major HAPs source. Coating Line 6 received a case-by-case MACT determination contained within the January 23, 2001 New Source Review permit to construct coating line 6. At the time of NSR permit issuance, MACT SSSS was proposed but not promulgated. Coating line 6 is a major HAPs source in itself, not counting HAP emissions from the rest of the plant. MACT SSSS is applicable to coating line 6.

This source is located in an attainment area for all pollutants. PSD does not apply, and the plant is not currently a PSD major source, but it is a T5 major source since single HAPS PTE exceeds 10 tons/yr, combined HAPS PTE exceeds 25 tons/yr, and VOC PTE is greater than 100 tons/yr. The HAPS are non-halogenated VOC solvents such as toluene in the organic solvent based organic coating, and all the VOC solvents are assumed to evaporate.

All fuel is natural gas with propane as a backup. The facility has no fuel burning equipment subject to air permitting requirements.

The organic coating materials are similar to solvent based paints. The coating materials are primarily rubber mixed with conventional paint solvents. The coatings are applied to the metal coils as a liquid layer without spraying, and immediately dried and cured/vulcanized in the drying/curing oven. The coating application stations, flash off areas, and the drying/curing oven represent total enclosures with all VOC emissions exhausting to the catalytic oxidizer/incinerator or thermal oxidizer.

NSPS Subpart TT, Metal Coil Coating, applies to both coating lines 5 and 6, including all the coil organic surface application and flash off areas, the drying/curing oven, and the catalytic oxidizer/incinerator and thermal incinerator. The NSPS does not apply to the coating preparation equipment such as coating mixing (CLMR) or storage tanks or fuel burning.

The facility requested revision of NSR permits in late 2005 to incorporate the changes required to demonstrate compliance with MACT SSSS. The NSR revisions for coating lines 5 and 6 were issued on February 15, 2006 and February 16, 2006, respectively.

## **COMPLIANCE STATUS**

The facility is inspected at least once per year. The facility is in compliance with the State Air Pollution Control Board regulations. Compliance with MACT SSSS was demonstrated under the previous requirements of this permit. The May 2006 reopening of the federal operating permit incorporates the methodology for compliance and removes the references to the now complete compliance schedule.

## **EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION**

The emission units are grouped as follows:

The emission units are grouped as follows:

**Coating Line # 5:** requirements for Coating Line # 5.

**Coating Line # 6:** requirements for Coating Line # 6.

**Coating Line Mixing Room:** requirements for the Coating Line Mixing Room.

**Miscellaneous Equipment:** requirements for rubber grinder with pneumatic transfer.

**Facility Wide:** requirements for all coating and mixing operations.

## Emission Units

### Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description
Provide the emission unit reference number.	Provide the stack number for the emission unit.	Provide a brief description of unit including manufacturer's name, model and date of construction if known.	Size and maximum rated capacity in units consistent with the standard or industry convention.	Provide a brief description of control device including manufacturer's name, model number and date of construction if known.
CL5	CL5	Coating Line #5 (steel/aluminum/metal coil coating/drying/curing oven)	662 lbs/hr VOC in coatings	one (1) catalytic oxidizer
CL6	CL6A and CL6B	Coating Line #6 – composed of CL6A and CL6B (steel/aluminum/metal coil coating/drying/curing oven)	770 lbs/hr VOC in coatings	one (1) catalytic oxidizer and one (1) thermal incinerator
CL6A	CL6A	Coating Line #6A for rubber and primer	536.2 lbs/hr VOC in coatings	one (1) catalytic oxidizer
CL6B	CL6B	Coating Line #6B for adhesive and water based graphite	230.28 lbs/hr VOC in coatings	one (1) thermal incinerator
CLMR	CL5, CL6A, CL6B	Coating Line Mixing Room (mixing/coating preparation equipment)	NA	CL5 or CL6 catalytic oxidizer or CL6 thermal incinerator

\*The Size/Rated capacity and PCD efficiency is provided for informational purposes only, and is not an applicable requirement.

**Pollutant control devices of the equipment to be operated:**

Emission Unit ID	Stack ID	Emission Unit Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Provide the emission unit reference number.	Provide the stack number for the emission unit.	Provide a brief description of unit including manufacturer's name, model and date of construction if known.	Provide the PCD identification number.	Identify pollutant controlled.	Date of current permit and amendments that did not supersede permit. If more than one date is included, please clarify which date is for permit and which date(s) are for amendment(s).
CL5	CL5	Coating Line #5 (steel/aluminum/metal coil coating/drying/curing oven)	CL5	VOC and VOC HAPs	2/15/2006
CL6	CL6A and CL6B	Coating Line #6 – composed of CL6A and CL6B (steel/aluminum/metal coil coating/drying/curing oven)	CL6A and CL6B	VOC and VOC HAPs	2/16/2006
CL6A	CL6A	Coating Line #6A for rubber and primer	CL6A	VOC and VOC HAPs	2/16/2006
CL6B	CL6B	Coating Line #6B for adhesive and water based graphite	CL6B	VOC and VOC HAPs	2/16/2006
CLMR	CL5 CL6A CL6B	Coating Line Mixing Room (mixing/coating preparation equipment)	CL5 CL6A CL6B	VOC and VOC HAPs	2/15/2006 & 2/16/2006

**\*The Size/Rated capacity and PCD efficiency is provided for informational purposes only, and is not an applicable requirement.**

**EMISSIONS INVENTORY**

Emissions are summarized in the following tables. The inventory from the renewal of the permit is still representative. Emissions changes due to MACT SSSS will not be quantified until the 2006 emission inventory.

**2002 Actual Emissions**

2002 Criteria Pollutant Emission in Tons/Year				
VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	NO <sub>x</sub>
13.07	0.21	0.00	0.00	0.25

**2002 Facility Hazardous Air Pollutant Emissions**

Pollutant	2002 Hazardous Air Pollutant Emission in Tons/Yr
Methanol	0.01
Ammonia	0.01
N-Hexane	0.24
Toluene	3.50

## EMISSION UNIT APPLICABLE REQUIREMENTS

### New Source Review Permit Requirements

The majority of conditions contained in the federal operating permit are requirements necessary to comply with the conditions of the New Source Review permits for the facility. The conditions of the federal operating permit and the corresponding conditions of the NSR permits are displayed in the table below.

Underlying NSR permit for Coating Line # 5 (Section III) is the February 15, 2006 permit. A copy of this permit is attached as Appendix B. A condition noted as B-X refers to condition X of the February 15, 2006 permit.

Underlying NSR permit for Coating Line # 6 (Section IV) is the February 16, 2006 permit. A copy of this permit is attached as Appendix D. A condition noted as D-X refers to condition X of the February 16, 2006 permit.

Title V Condition	NSR Condition	Description	VAC Applicable Requirement
III-A-1	B-2	VOC control – oxidizer & enclosure	9 VAC 5-50-260, 9 VAC 5-50-410, 9 VAC 5-60-100
III-A-2	B-3	Oxidizer set-point	9 VAC 5-50-260, 9 VAC 5-50-410, 9 VAC 5-60-100
III-A-3	B-10	Throughput limit	9 VAC 5-80-1180
III-A-4	B-11	Requirement by reference	9 VAC 5-50-400, 9 VAC 5-50-410
III-A-5	B-12	Requirement by reference	9 VAC 5-60-90, 9 VAC 5-60-100
III-A-6	B-13	Requirement by reference	9 VAC 5-80-110 (9 VAC 5-170-160)
III-A-7	B-14	Control equipment malfunction	9 VAC 5-20-180
III-A-8	B-15	Emission limit	9 VAC 5-50-260, 9 VAC 5-60-300
III-A-9	B-16	Visible emission limit	9 VAC 5-50-260
III-A-10	B-21	Maintenance procedures	9 VAC 5-50-20
III-B-1	B-3	Oxidizer monitors	9 VAC 5-50-260, 9 VAC 5-50-410, 9 VAC 5-60-100
III-B-2	B-4	Catalyst bed monitoring	9 VAC 5-50-410
III-B-3	B-5	Enclosure monitoring	9 VAC 5-50-260
III-B-4	B-6	Enclosure monitoring	9 VAC 5-50-260, 9 VAC 5-50-410, 9 VAC 5-60-100
III-C-1	B-19a	VOC throughput records	9 VAC 5-50-50
III-C-2	B-19b	VOC emission records	9 VAC 5-50-50
III-C-3	B-19c	Oxidizer temperature records	9 VAC 5-50-50
III-C-4	B-19d	Catalyst bed records	9 VAC 5-50-50
III-C-5	B-19e	Enclosure pressure records	9 VAC 5-50-50
III-C-6	B-19f	Stack test & VEE records	9 VAC 5-50-50
III-C-7	B-19g	Monitoring calibration records	9 VAC 5-50-50
III-C-8	B-19i	Maintenance & training records	9 VAC 5-50-50
III-D-1	B-9	Testing & monitoring ports	9 VAC 5-50-30
III-D-2	B-17	Stack tests	9 VAC 5-50-30
III-D-3	B-18	VEE's	9 VAC 5-50-30
IV-A-1	D-2	VOC control – oxidizer & enclosure	9 VAC 5-50-260, 9 VAC 5-50-410, 9 VAC 5-60-100
IV-A-2	D-3	Catalytic oxidizer set-point	9 VAC 5-50-260, 9 VAC 5-50-410, 9 VAC 5-60-100

Title V Condition	NSR Condition	Description	VAC Applicable Requirement
IV-A-3	D-5	Thermal oxidizer set-point	9 VAC 5-50-260, 9 VAC 5-50-410, 9 VAC 5-60-100
IV-A-4	D-11	Throughput limit	9 VAC 5-80-1180
IV-A-5	D-12	Requirement by reference	9 VAC 5-50-400, 9 VAC 5-50-410
IV-A-6	D-13	Requirement by reference	9 VAC 5-60-90, 9 VAC 5-60-100
IV-A-7	D-14	Requirement by reference	9 VAC 5-80-110 (9 VAC 5-170-160)
IV-A-8	D-15	Control equipment malfunction	9 VAC 5-20-180
IV-A-9	D-16	Emission limit	9 VAC 5-50-260, 9 VAC 5-60-300
IV-A-10	D-17	Visible emission limit	9 VAC 5-50-260
IV-A-11	D-22	Maintenance procedures	9 VAC 5-50-20
IV-B-1	D-3	Catalytic oxidizer monitors	9 VAC 5-50-260, 9 VAC 5-50-410, 9 VAC 5-60-100
IV-B-2	D-4	Catalyst bed monitoring	9 VAC 5-50-410
IV-B-3	D- 5	Thermal oxidizer monitors	9 VAC 5-50-260, 9 VAC 5-50-410, 9 VAC 5-60-100
IV-B-4	D-6	Enclosure monitoring	9 VAC 5-50-260
IV-B-5	D-7	Enclosure monitoring	9 VAC 5-50-260, 9 VAC 5-50-410, 9 VAC 5-60-100
IV-C-1	D-20a	VOC throughput records	9 VAC 5-50-50
IV-C-2	D-20b	VOC emission records	9 VAC 5-50-50
IV-C-3	D-20c	Catalytic oxidizer temperature records	9 VAC 5-50-50
IV-C-4	D-20d	Catalyst bed records	9 VAC 5-50-50
IV-C-5	D-20e	Thermal oxidizer temperature records	9 VAC 5-50-50
IV-C-6	D-20f	Enclosure pressure records	9 VAC 5-50-50
IV-C-7	D-20g	Stack test & VEE records	9 VAC 5-50-50
IV-C-8	D-20h	Monitoring calibration records	9 VAC 5-50-50
IV-C-9	D-20j	Maintenance & training records	9 VAC 5-50-50
IV-D-1	D-10	Testing & monitoring ports	9 VAC 5-50-30
IV-D-2	D-18	Stack tests	9 VAC 5-50-30
IV-D-3	D-19	VEE's	9 VAC 5-50-30
V-A-1	B-7, D-8	Mixing room VOC control	9 VAC 5-50-260
VII-A-1	B-8, D-9	VOC work practice	9 VAC 5-50-20
VII-A-2	B-24, D-25	Violation of ambient air standard	9 VAC 5-20-180
VII-C-1	B-19f, D-20g	Stack test & VEE records	9 VAC 5-50-50
VII-C-2	B-19h, D-20i	MSDS records	9 VAC 5-50-50
VII-C-3	B-22, D-23	Malfunction records	9 VAC 5-20-180

### Standard Testing Methods and Test Ports

It is the practice of the agency to reference the appropriate USEPA test methods for testing done in addition to monitoring explicitly specified in federal operating permits. Conditions III-D-4, IV-D-4, VI-D-2, and VII-D-2 summarize the appropriate test methods. The requirement for test ports, 9 VAC 5-50-30, was intended to be facility wide. Although no testing other than coating lines is anticipated, VII-D-1 is added for completeness



### **Proper Equipment Operation**

The underlying NSR permits require control of mixing room emissions by the coating line oxidizers. Previously, the monitoring, record keeping, and testing for the coating lines was presumed sufficient to insure compliance. Minor additional requirements were added on this reopening to include checks for capture system integrity.

The facility also has a pneumatic conveying system for ground rubber. A filtration malfunction of the system filter could create emissions. Conditions VI-A-1 and VI-D-1, along with facility wide requirements, insure that the conveying system is checked periodically for malfunction.

### **Periodic Monitoring**

The permit content requirements of the regulations for federal operating permits, 9 VAC 5-80-110, state that the permit should include conditions for periodic monitoring sufficient to demonstrate that the facility is in compliance with the limits of the permit. The record keeping requirements are deemed sufficient to determine compliance with the emission limits for VOCs. No opacity is expected to be observed under normal operation of the equipment. Under these conditions, a weekly modified Method 22 evaluation, with requirement for Method 9 evaluation if opacity is observed, is deemed sufficient to satisfy the periodic monitoring requirement for opacity compliance.

Condition VII-B-1 requires Method 22 evaluation of the incinerators and spray booths and, if opacity is observed, documentation of corrective action or a Method 9 evaluation to show the opacity is within permit limits.

Condition VII-C-5 requires that records of the periodic monitoring results be maintained.

### **Miscellaneous Requirements**

Condition VII-C-4 was added for flexibility. Since no facility inspection has occurred since compliance with MACT SSSS was required, VDEQ is not completely certain that the record keeping requirements of sections III-C and IV-C will completely meet all requirements of the MACT for record keeping. This condition will insure that if any deficiencies are discovered, existing permits will not need to be reopened to correct such deficiencies.

### **GENERAL CONDITIONS**

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110, that apply to all federal operating permit sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions, including those caused by upsets, within one business day.

## STATE-ONLY APPLICABLE REQUIREMENTS

The following Virginia Administrative Codes have specific requirements only enforceable by the State :

Odorous Emissions      9 VAC 5-50-310  
Toxic Pollutants        9 VAC 5-50-320

The underlying NSR permits contain no state-only enforceable conditions.

## FUTURE APPLICABLE REQUIREMENTS

This facility is a major source of hazardous air pollutants (list HAPs). No future applicable requirements are anticipated under future MACT standards

## INSIGNIFICANT EMISSION UNITS

The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
CL5B	Unit 5 Boiler (gas)	9 VAC 5-80-720C	NO <sub>x</sub> , VOC, PM, CO	4.5 MMBtu/hr input natural gas/propane
G1 & G2	Oil Water Separators	9 VAC 5-80-720B	VOC	36 gallons
T1	Solvent Tank	9 VAC 5-80-720B	VOC	10,000 gal.
T2	Solvent Tank	9 VAC 5-80-720B	VOC	5000 gal.
T3	Solvent Tank	9 VAC 5-80-720B	VOC	3000 gal.
T4	Solvent Tank	9 VAC 5-80-720B	VOC	5,000 gal.
CL6C	Unit 6 Boiler (gas)	9 VAC 5-80-720C	NO <sub>x</sub> , VOC, PM, CO	4.7 MMBtu/hr input natural gas/propane

These insignificant emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

## **CONFIDENTIAL INFORMATION**

No information contained in the permit application or in the specific records required by the permit is considered confidential.

## **PUBLIC PARTICIPATION**

This action is considered a minor modification, it specifies methodology for compliance with MACT requirements. The permit was submitted to USEPA for review on May 10, 2006. West Virginia was notified of the action as an affected state. The final day for USEPA comments was June 26, 2006. No comments were received from USEPA.

## APPENDIX A: NSR/FOP CORRESPONDENCE TABLE

The following table is a modification of the table in the section Emission Unit Applicable Requirements – New Source Review Permit Requirements. This table is ordered corresponding to the February 15, 2006, NSR permit conditions as an aid to reference the corresponding federal operating permit conditions. The NSR permit follows in Appendix B.

NSR Condition	Title V Condition	Description	VAC Applicable Requirement
2	III-A-1	VOC control – oxidizer & enclosure	9 VAC 5-50-260, 9 VAC 5-50-410, 9 VAC 5-60-100
3	III-A-2, III-B-1	Oxidizer monitors and set-point	9 VAC 5-50-260, 9 VAC 5-50-410, 9 VAC 5-60-100
4	III-B-2	Catalyst bed monitoring	9 VAC 5-50-410
5	III-B-3	Enclosure monitoring	9 VAC 5-50-260
6	III-B-4	Enclosure monitoring	9 VAC 5-50-260, 9 VAC 5-50-410, 9 VAC 5-60-100
7	V-A-1	Mixing room VOC control	9 VAC 5-50-260
8	VII-A-1	VOC work practice	9 VAC 5-50-20
9	III-D-1	Testing & monitoring ports	9 VAC 5-50-30
10	III-A-3	Throughput limit	9 VAC 5-80-1180
11	III-A-4	Requirement by reference	9 VAC 5-50-400, 9 VAC 5-50-410
12	III-A-5	Requirement by reference	9 VAC 5-60-90, 9 VAC 5-60-100
13	III-A-6	Requirement by reference	9 VAC 5-80-110 (9 VAC 5-170-160)
14	III-A-7	Control equipment malfunction	9 VAC 5-20-180
15	III-A-8	Emission limit	9 VAC 5-50-260, 9 VAC 5-60-300
16	III-A-9	Visible emission limit	9 VAC 5-50-260
17	III-D-2	Stack tests	9 VAC 5-50-30
18	III-D-3	VEE's	9 VAC 5-50-30
19a	III-C-1	VOC throughput records	9 VAC 5-50-50
19b	III-C-2	VOC emission records	9 VAC 5-50-50
19c	III-C-3	Oxidizer temperature records	9 VAC 5-50-50
19d	III-C-4	Catalyst bed records	9 VAC 5-50-50
19e	III-C-5	Enclosure pressure records	9 VAC 5-50-50
19f	III-C-6, VII-C-1	Stack test & VEE records	9 VAC 5-50-50
19g	III-C-7	Monitoring calibration records	9 VAC 5-50-50
19h	VII-C-2	MSDS records	9 VAC 5-50-50
19i	III-C-8	Maintenance & training records	9 VAC 5-50-50
20	X-Q	Right of entry	9 VAC 5-170-130
21	III-A-10	Maintenance procedures	9 VAC 5-50-20
22	VII-C-3	Malfunction records	9 VAC 5-20-180
23	X-F	Notification of control malfunction	9 VAC 5-20-180
24	VII-A-2	Violation of ambient air standard	9 VAC 5-20-180
25	X-V	Permit suspension/revocation	9 VAC 5-80-1210
26	X-T	Change of ownership	9 VAC 5-80-1240
27	X-L	Registration/update	9 VAC 5-170-60, 9 VAC 5-20-160
28	X-S	Permit Copy	9 VAC 5-80-110 (9 VAC 5-170-160)

**APPENDIX B: NSR PERMIT DATED February 15, 2006**

The permit, with its own page numbering, follows.

**STATIONARY SOURCE PERMIT TO MODIFY AND OPERATE**

**This permit includes designated equipment to New Source Performance Standards (NSPS).**

**This permit includes designated equipment subject to National Emission Standards for Hazardous Air Pollutants for Source Categories.**

This permit supersedes your permit dated April 11, 1995, as amended September 9, 1998, May 27, 2003, and August 26, 2003.

In compliance with the Federal Clean Air Act and the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution,

Wolverine Gasket Division, Eagle-Picher Industries  
201 Industrial Park Road  
Blacksburg, Virginia 24060  
Registration No.: 21240  
State/County/Plant ID No.: 51-121-0080

is authorized to modify and operate coating line #5 to produce gasket material located at

3175 State Street, in the Blacksburg Industrial Park, Blacksburg, Virginia

in accordance with the Conditions of this permit.

Approved on February 15, 2006.

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Wolverine Gasket Division, Eagle-Picher Industries

Registration Number: 21240

February 15, 2006

Page 2

David K. Paylor

Director, Department of Environmental Quality

Permit consists of 8 pages.

Permit Conditions 1 to 28.

## **INTRODUCTION**

This permit approval is based on the permit application dated December 2, 2005, including amendment information dated December 7, 2005. Operating parameters not covered in that application shall be as represented in the applications dated January 23, 1995, including amendment information dated February 11 & 17, 1995; March 6 & 7, 1995; September 8, 1998; and July 1, 2003. Any changes in the permit application specifications or any existing facilities which alter the impact of the facility on air quality may require a permit. Failure to obtain such a permit prior to construction may result in enforcement action.

Words or terms used in this permit shall have meanings as provided in 9 VAC 5-10-10 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution. The regulatory reference or authority for each condition is listed in parentheses () after each condition.

Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate a prompt response by the permittee to requests by the DEQ or the Board for information to include, as appropriate: process and production data; changes in control equipment; and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact.

The availability of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, §§ 2.2-3700 through 2.2-3714 of the Code of Virginia, § 10.1-1314 (addressing information provided to the Board) of the Code of Virginia, and 9 VAC 5-170-60 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information.

## **PERMIT CONDITIONS**

### **PROCESS REQUIREMENTS**

1. **Equipment List** - Equipment to be modified\* at this facility consists of:

- Metal coil coating line # 5 (NSPS TT), (MACT SSSS);

\* modification consists of upgrading oxidizers and enclosures for MACT compliance

Previously permitted equipment at this facility prior to the date of this permit consists of:

- Coating mix preparation equipment



(9 VAC 5-80-1100)

2. **Emission Controls** – Volatile organic compound (VOC) emissions from the metal coil coating Line # 5 (CL5) shall be controlled by permanent total enclosure and a catalytic oxidizer/incinerator having a 98% destruction efficiency. The catalytic oxidizer/incinerator shall be provided with adequate access for inspection.  
(9 VAC 5-80-1180, 9 VAC 5-50-260, 9 VAC 5-50-410, and 9 VAC 5-60-100)
3. **Monitoring** – The catalytic oxidizer on coil coating Line # 5, during actual coating operations, shall have a 3-hour average gas temperature immediately before the catalyst bed (catalyst inlet gas temperature) not less than the temperature when compliance was demonstrated during the most recent measurement of oxidizer efficiency. The 3-hour average catalyst inlet gas temperature was 630 °F during the compliance test for MACT SSSS in 2005. The catalytic incinerator shall be equipped with devices to monitor and record continuously the gas temperature upstream of the incinerator catalyst bed in accordance with MACT SSSS and NSPS TT.  
(9 VAC 5-50-260, 9 VAC 5-50-410, and 9 VAC 5-60-100)
4. **Monitoring** - The permittee shall conduct monitoring in accordance with the CL5 metal coil coating line catalyst bed inspection schedule and maintenance plan. The plan shall address the elements below in accordance with 40 CFR 63.5160(d)(3)(ii) (C) and (D) per 40 CFR 63.5150(a)(3)(iii):
  - a. Annual sampling and analysis of the catalyst activity (conversion efficiency) following the manufacturer's or catalyst supplier's recommended procedures.
  - b. Monthly inspection of the oxidizer system, including the burner assembly and fuel lines, for problems.
  - c. Annual internal and monthly external inspection of the catalyst bed to check for channeling, abrasion, and/or settling. If problems are found, the permittee shall take corrective action consistent with the manufacturer's recommendations and conduct a new performance test to determine destruction efficiency according to 40 CFR 63.5160.

(9 VAC 5-80-1180, 9 VAC 5-60-100, and 9 VAC 5-170-160)

5. **Monitoring Devices** - The permanent total enclosure(s) for metal coil coating Line # 5 shall be equipped with devices to continuously measure the magnitude of negative pressure in the enclosure. Each monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access

for inspection and shall be in operation when metal coil coating Line # 5 is operating, excepting brief periods of instrument maintenance.

(9 VAC 5-80-1180 D and 9 VAC 5-50-260)

6. **Monitoring** – The permittee shall conduct monitoring in accordance with the CL5 metal coil coating line capture system monitoring plan but not less frequently than once per shift to ensure good performance of the total enclosures. The permittee shall keep a log of the observations.  
(9 VAC 5-50-260, 9 VAC 5-50-410, and 9 VAC 5-60-100)
7. **Emission Controls** – Volatile organic compound (VOC) emissions from the coating mix preparation equipment (all mixing vessels in which solvent and other materials are blended to prepare rubber/polymeric coatings) shall be controlled by a coating line catalytic oxidizer/incinerator at all times that a coating line is in operation.  
(9 VAC 5-80-1180 and 9 VAC 5-50-260)
8. **VOC Work Practice Standards** – At all times the disposal of volatile organic compounds shall be accomplished by taking measures, to the extent practicable, consistent with air pollution control practices for minimizing emissions. Volatile organic compounds shall not be intentionally spilled, discarded in sewers which are not connected to a treatment plant, or stored in open containers, or handled in any other manner that would result in evaporation beyond that consistent with air pollution practices for minimizing emissions.  
(9 VAC 5-50-20 F and 9 VAC 5-80-1180)
9. **Testing/Monitoring Ports** - Metal coil coating Line # 5 shall be modified so as to allow for emissions testing upon reasonable notice at any time, using appropriate methods. Sampling ports shall be provided when requested at the appropriate locations and safe sampling platforms and access shall be provided.  
(9 VAC 5-50-30 F and 9 VAC 5-80-1180)

### **OPERATING LIMITATIONS**

10. **Throughput** - The volatile organic compound throughput for metal coil coating Line # 5 and its coating preparation equipment shall not exceed 1,844.4 tons per year, calculated as the sum of each 12 consecutive month period.  
(9 VAC 5-80-1180)
11. **Requirements by Reference** - Except where this permit is more restrictive than the applicable requirement, the NSPS equipment as described in Condition 1 shall be operated in compliance with the requirements of 40 CFR 60, Subpart TT.  
(9 VAC 5-80-1180, 9 VAC 5-50-400 and 9 VAC 5-50-410)

12. **Requirements by Reference** - Except where this permit is more restrictive than the applicable requirement, the MACT equipment as described in Condition 1 shall be operated in compliance with the requirements of 40 CFR 63, Subpart SSSS.  
(9 VAC 5-80-1180, 9 VAC 5-60-90 and 9 VAC 5-60-100)
13. **Requirements by Reference** – In such areas where requirements of 40 CFR 60.460 et seq. (NSPS Subpart TT) and 40 CFR 63.5080 et seq. (MACT Subpart SSSS) may create a conflict, MACT Subpart SSSS is deemed to be the prevailing regulation.  
(9 VAC 5-170-160)

**14. Facility or Control Equipment Malfunction - Hazardous Air Pollutant Processes**

- Metal coil coating Line # 5 shall shut down immediately if it is unable to meet the applicable emission standards, and shall not return to operation until it is able to operate in compliance with the applicable emission standards.

(9 VAC 5-20-180 F 2)

**EMISSION LIMITATIONS**

**15. Emission Limits** - Emissions from the operation of the coating preparation equipment and metal coil coating Line # 5 shall not exceed the limits specified below:

Volatile Organic Compounds	13.24 lbs/hr	36.9 tons/yr
----------------------------	--------------	--------------

(9 VAC 5-50-260 and 9 VAC 5-60-300)

**16. Visible Emission Limit** - Visible emissions from metal coil coating Line # 5 shall not exceed five percent (5%) opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).

(9 VAC 5-80-1180 and 9 VAC 5-50-260)

**CONTINUING COMPLIANCE DETERMINATION**

**17. Stack Tests** - Upon request by the DEQ, the permittee shall conduct performance tests for Volatile Organic Compounds from the coating preparation equipment and/or metal coil coating Line # 5 to demonstrate compliance with the emission limits and control efficiency requirements contained in this permit. The details of the tests shall be arranged with the Air Compliance Manager, West Central Regional Office.

(9 VAC 5-50-30 G)

**18. Visible Emissions Evaluation** - Upon request by the DEQ, the permittee shall conduct visible emission evaluations from metal coil coating Line # 5 to demonstrate compliance with the visible emission limits contained in this permit. The details of the tests shall be arranged with the Air Compliance Manager, West Central Regional Office.

(9 VAC 5-50-30 G)

**RECORDS**

**19. On Site Records** - The permittee shall maintain records of emission data and operating para-meters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Air Compliance Manager, West Central Regional Office. These records shall include, but are not limited to:

- a. Monthly and annual VOC throughput in tons for metal coil coating Line # 5 and its coating from the coating preparation equipment. Annual throughput shall be calculated as the sum of each consecutive 12 month period.
- b. Monthly and annual VOC emissions in tons from metal coil coating Line # 5 including its coating preparation equipment. Annual emissions shall be calculated as the sum of each consecutive 12 month period.
- c. Temperature records of the Line # 5 catalytic oxidizer upstream of the catalyst bed.
- d. Monitoring records for the catalyst bed.
- e. Once per shift records of the negative pressure of the Line # 5 enclosure(s) and any additional records specified in the monitoring plan.
- f. Results of all stack tests, visible emission evaluations and performance evaluations.
- g. Monitoring system calibrations and calibration checks.
- h. Material Safety Data Sheets (MSDS), Certified Product Data Sheets (CPDS) or other vendor information approved by VDEQ showing VOC content, HAP content, water content, and solids content for each coating used.
- i. Scheduled and unscheduled maintenance, and operator training.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

(9 VAC 5-80-1180 and 9 VAC 5-50-50)

## **GENERAL CONDITIONS**

**20. Right of Entry** - The permittee shall allow authorized local, state, and federal representatives, upon the presentation of credentials:

- a. To enter upon the permittee's premises on which the facility is located or in which any records are required to be kept under the terms and conditions of this permit;
- b. To have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit or the State Air Pollution Control Board Regulations;

- c. To inspect at reasonable times any facility, equipment, or process subject to the terms and conditions of this permit or the State Air Pollution Control Board Regulations; and
- d. To sample or test at reasonable times.

For purposes of this condition, the time for inspection shall be deemed reasonable during regular business hours or whenever the facility is in operation. Nothing contained herein shall make an inspection time unreasonable during an emergency. (9 VAC 5-170-130 and 9 VAC 5-80-1180)

**21. Maintenance/Operating Procedures** – At all times, including periods of start-up, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate the affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions. The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment and process equipment which affect such emissions:

- a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
- b. Maintain an inventory of spare parts.
- c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
- d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures, prior to their first operation of such equipment. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request. (9 VAC 5-50-20 E and 9 VAC 5-80-1180 D)

**22. Record of Malfunctions** – The permittee shall maintain records of the occurrence and duration of any bypass, malfunction, shutdown or failure of the facility or its associated air pollution control equipment that results in excess emissions for more than one hour. Records shall include the date, time, duration, description (emission unit, pollutant affected, cause), corrective action, preventive measures taken and name of person generating the record. (9VAC 5-20-180 J and 9 VAC 5-80-1180 D)

**23. Notification for Facility or Control Equipment Malfunction** - The permittee shall furnish notification to the Air Compliance Manager, West Central Regional Office of malfunctions of the affected facility or related air pollution control equipment that may cause excess emissions for more than one hour, by facsimile transmission, telephone, or telegraph. Such notification shall be made as soon as practicable but no later than four daytime business hours after the malfunction is discovered. The permittee shall provide a written statement giving all pertinent facts, including the estimated duration of the breakdown, within two weeks of the discovery of the malfunction. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the permittee shall notify Air Compliance Manager, West Central Regional Office in writing.  
(9 VAC 5-20-180 C and 9 VAC 5-80-1180)

**24. Violation of Ambient Air Quality Standard** - The permittee shall, upon request of the DEQ, reduce the level of operation or shut down a facility, as necessary to avoid violating any primary ambient air quality standard and shall not return to normal operation until such time as the ambient air quality standard will not be violated.  
(9 VAC 5-20-180 I and 9 VAC 5-80-1180)

**25. Permit Suspension/Revocation** - This permit may be suspended or revoked if the permittee:

- a. Knowingly makes material misstatements in the permit application or any amendments to it;
- b. Fails to comply with the conditions of this permit;
- c. Fails to comply with any emission standards applicable to a permitted emissions unit;
- d. Causes emissions from the stationary source which result in violations of , or interfere with the attainment and maintenance of, any ambient air quality standard; or
- e. Fails to operate in conformance with any applicable control strategy, including any emission standards or emission limitations, in the State Implementation Plan in effect at the time an application for this permit is submitted.

(9 VAC 5-80-1210 F)

**26. Change of Ownership** - In the case of a transfer of ownership of a stationary source, the new owner shall abide by any current permit issued to the previous owner. The new owner shall notify the Director, West Central Regional Office of the change of ownership within 30 days of the transfer.  
(9 VAC 5-80-1240)

**27. Registration/Update** - Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate a prompt response by the permittee to requests by the DEQ or the Board for information to include, as appropriate: process and production data; changes in control equipment; and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact. The availability of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, §§ 2.1-340 through 2.1-348 of the Code of Virginia, § 10.1-1314 (addressing information provided to the Board) of the Code of Virginia, and 9 VAC 5-170-60 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information.

(9 VAC 5-170-60 and 9 VAC 5-20-160)

**28. Permit Copy** - The permittee shall keep a copy of this permit on the premises of the facility to which it applies.

(9 VAC 5-170-160)



## APPENDIX C: NSR/FOP CORRESPONDENCE TABLE

The following table is a modification of the table in the section Emission Unit Applicable Requirements – New Source Review Permit Requirements. This table is ordered corresponding to the February 16, 2006, NSR permit conditions as an aid to reference the corresponding federal operating permit conditions. The NSR permit follows in Appendix D.

NSR Condition	Title V Condition	Description	VAC Applicable Requirement
2	IV-A-1	VOC control – oxidizer & enclosure	9 VAC 5-50-260, 9 VAC 5-50-410, 9 VAC 5-60-100
3	IV-A-2, IV-B-1	Catalytic oxidizer monitors and set-point	9 VAC 5-50-260, 9 VAC 5-50-410, 9 VAC 5-60-100
4	IV-B-2	Catalyst bed monitoring	9 VAC 5-50-410
5	IV-A-3, IV-B-3	Thermal oxidizer monitors and set-point	9 VAC 5-50-260, 9 VAC 5-50-410, 9 VAC 5-60-100
6	IV-B-4	Enclosure monitoring	9 VAC 5-50-260
7	IV-B-5	Enclosure monitoring	9 VAC 5-50-260, 9 VAC 5-50-410, 9 VAC 5-60-100
8	V-A-1	Mixing room VOC control	9 VAC 5-50-260
9	VII-A-1	VOC work practice	9 VAC 5-50-20
10	IV-D-1	Testing & monitoring ports	9 VAC 5-50-30
11	IV-A-4	Throughput limit	9 VAC 5-80-1180
12	IV-A-5	Requirement by reference	9 VAC 5-50-400, 9 VAC 5-50-410
13	IV-A-6	Requirement by reference	9 VAC 5-60-90, 9 VAC 5-60-100
14	IV-A-7	Requirement by reference	9 VAC 5-80-110 (9 VAC 5-170-160)
15	IV-A-8	Control equipment malfunction	9 VAC 5-20-180
16	IV-A-9	Emission limit	9 VAC 5-50-260, 9 VAC 5-60-300
17	IV-A-10	Visible emission limit	9 VAC 5-50-260
18	IV-D-2	Stack tests	9 VAC 5-50-30
19	IV-D-3	VEE's	9 VAC 5-50-30
20a	IV-C-1	VOC throughput records	9 VAC 5-50-50
20b	IV-C-2	VOC emission records	9 VAC 5-50-50
20c	IV-C-3	Catalytic oxidizer temperature records	9 VAC 5-50-50
20d	IV-C-4	Catalyst bed records	9 VAC 5-50-50
20e	IV-C-5	Thermal oxidizer temperature records	9 VAC 5-50-50
20f	IV-C-6	Enclosure pressure records	9 VAC 5-50-50
20g	IV-C-7, VII-C-1	Stack test & VEE records	9 VAC 5-50-50
20h	IV-C-8	Monitoring calibration records	9 VAC 5-50-50
20i	VII-C-2	MSDS records	9 VAC 5-50-50
20j	IV-C-9	Maintenance & training records	9 VAC 5-50-50
21	X-Q	Right of entry	9 VAC 5-170-130
22	IV-A-11	Maintenance procedures	9 VAC 5-50-20
23	VII-C-3	Malfunction records	9 VAC 5-20-180
24	X-F	Notification of control malfunction	9 VAC 5-20-180
25	VII-A-2	Violation of ambient air standard	9 VAC 5-20-180
26	X-V	Permit suspension/revocation	9 VAC 5-80-1210
27	X-T	Change of ownership	9 VAC 5-80-1240
28	X-L	Registration/update	9 VAC 5-170-60, 9 VAC 5-20-160
29	X-S	Permit Copy	9 VAC 5-80-110 (9 VAC 5-170-160)

**APPENDIX D: NSR PERMIT DATED February 16, 2006**

The permit, with its own page numbering, follows.

**STATIONARY SOURCE PERMIT TO MODIFY AND OPERATE**

**This permit includes designated equipment to New Source Performance Standards NSPS .**

**This permit includes designated equipment sub ect to National Emission Standards for  
Hazardous Air Pollutants for Source Categories.**

This permit supersedes your permit dated January 23, 2001, as amended September 19, 2003.

In compliance with the Federal Clean Air Act and the Commonwealth of Virginia  
Regulations for the Control and Abatement of Air Pollution,

Wolverine Gasket Division, Eagle-Picher Industries  
201 Industrial Park Road  
Blacksburg, Virginia 24060  
Registration No.: 21240  
State/County/Plant ID No.: 51-121-0080

is authorized to modify and operate coating line # 6 to produce gasket material located at

3175 State Street, in the Blacksburg Industrial Park, Blacksburg, Virginia

in accordance with the Conditions of this permit.

Approved on February 16, 2006.

David . Paylor  
Director, Department of Environmental Quality

Permit consists of 9 pages.  
Permit Conditions 1 to 29.

## **INTRODUCTION**

This permit approval is based on the permit application dated December 2, 2005. Operating parameters not covered in that application shall be as represented in the applications dated January 23, 1995, including amendment information dated September 8, 2000, including amendment sheets dated July 1, 2003. Any changes in the permit application specifications or any existing facilities which alter the impact of the facility on air quality may require a permit. Failure to obtain such a permit prior to construction may result in enforcement action.

Words or terms used in this permit shall have meanings as provided in 9 VAC 5-10-10 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution. The regulatory reference or authority for each condition is listed in parentheses () after each condition.

Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate a prompt response by the permittee to requests by the DEQ or the Board for information to include, as appropriate: process and production data changes in control equipment and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact.

The availability of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, 2.2-3700 through 2.2-3714 of the Code of Virginia, 10.1-1314 (addressing information provided to the Board) of the Code of Virginia, and 9 VAC 5-170-60 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information.

## **PERMIT CONDITIONS**

### **PROCESS REQUIREMENTS**

1. **Equipment List** - Equipment to be modified\* at this facility consists of:

- Metal coil coating line # 6 (NSPS TT), (MACT SSSS)

CL6A is the coating section for rubber and primer CL6B is the section for adhesives

\* modification consists of upgrading oxidizers and enclosures for MACT compliance

Previously permitted equipment at this facility prior to the date of this permit consists of:

- Coating mix preparation equipment

(9 VAC 5-80-1100)

2. **Emission Controls** – Volatile organic compound (VOC) emissions from the metal coil coating Line # 6A (CL6A) shall be controlled by permanent total enclosure and a catalytic oxidizer/incinerator having a 98% destruction efficiency. Volatile organic compound (VOC) emissions from the metal coil coating Line # 6B (CL6B) shall be controlled by permanent total enclosure and a thermal oxidizer/incinerator having a 98% destruction efficiency. Both the catalytic oxidizer/incinerator and the thermal oxidizer/incinerator shall be provided with adequate access for inspection.  
(9 VAC 5-80-1180, 9 VAC 5-50-260, 9 VAC 5-50-410, and 9 VAC 5-60-100)
3. **Monitoring** – The catalytic oxidizer on coil coating Line # 6A, during actual coating operations, shall have a 3-hour average gas temperature immediately before the catalyst bed (catalyst inlet gas temperature) not less than the temperature when compliance was demonstrated during the most recent measurement of oxidizer efficiency. The 3-hour average catalyst inlet gas temperature was 621 °F during the compliance test for MACT SSSS in 2004. The catalytic oxidizer shall be equipped with devices to monitor and record continuously the gas temperature upstream of the incinerator catalyst bed in accordance with MACT SSSS and NSPS TT.  
(9 VAC 5-50-260, 9 VAC 5-50-410, and 9 VAC 5-60-100)
4. **Monitoring** - The permittee shall conduct monitoring in accordance with the CL6 metal coil coating line catalyst bed inspection schedule and maintenance plan. The plan shall address the elements below in accordance with 40 CFR 63.5160(d)(3)(ii) (C) and (D) per 40 CFR 63.5150(a)(3)(iii):
  - a. Annual sampling and analysis of the catalyst activity (conversion efficiency) following the manufacturer's or catalyst supplier's recommended procedures.
  - b. Monthly inspection of the oxidizer system, including the burner assembly and fuel lines, for problems.
  - c. Annual internal and monthly external inspection of the catalyst bed to check for channeling, abrasion, and/or settling. If problems are found, the permittee shall take corrective action consistent with the manufacturer's recommendations and conduct a new performance test to determine destruction efficiency according to 40 CFR 63.5160.  
(9 VAC 5-80-1180, 9 VAC 5-60-100, and 9 VAC 5-170-160)
5. **Monitoring** – The thermal incinerator on coil coating Line # 6B, during actual coating operations, shall have a 3-hour average combustion temperature measured at or near the combustion chamber exit not less than the temperature when compliance was demonstrated during the most recent measurement of oxidizer efficiency. The 3-hour average combustion chamber temperature was 1390 °F during the compliance test for MACT SSSS in 2004. The thermal incinerator shall be equipped with a device to monitor and record continuously the combustion chamber temperature at or near the combustion chamber exit.  
(9 VAC 5-50-260, 9 VAC 5-50-410, and 9 VAC 5-60-100)

6. **Monitoring Devices** - The permanent total enclosure(s) for metal coil coating Line # 6 shall be equipped with devices to continuously measure the magnitude of negative pressure in the enclosure. Each monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when metal coil coating Line # 6 is operating, excepting brief periods of instrument maintenance.  
(9 VAC 5-80-1180 D and 9 VAC 5-50-260)
7. **Monitoring** – The permittee shall conduct monitoring in accordance with the CL6 metal coil coating line capture system monitoring plan but not less frequently than once per shift to ensure good performance of the total enclosures. The permittee shall keep a log of the observations.  
(9 VAC 5-50-260, 9 VAC 5-50-410, and 9 VAC 5-60-100)
8. **Emission Controls** – Volatile organic compound (VOC) emissions from the coating mix preparation equipment (all mixing vessels in which solvent and other materials are blended to prepare rubber/polymeric coatings) shall be controlled by a coating line catalytic oxidizer/incinerator at all times that a coating line is in operation.  
(9 VAC 5-80-1180 and 9 VAC 5-50-260)
9. **VOC Work Practice Standards** – At all times the disposal of volatile organic compounds shall be accomplished by taking measures, to the extent practicable, consistent with air pollution control practices for minimizing emissions. Volatile organic compounds shall not be intentionally spilled, discarded in sewers which are not connected to a treatment plant, or stored in open containers, or handled in any other manner that would result in evaporation beyond that consistent with air pollution practices for minimizing emissions.  
(9 VAC 5-50-20 F and 9 VAC 5-80-1180)
10. **Testing/Monitoring Ports** - Metal coil coating Line # 6 shall be modified so as to allow for emissions testing upon reasonable notice at any time, using appropriate methods. Sampling ports shall be provided when requested at the appropriate locations and safe sampling platforms and access shall be provided.  
(9 VAC 5-50-30 F and 9 VAC 5-80-1180)

### **OPERATING LIMITATIONS**

11. **Throughput** - The volatile organic compound throughput for metal coil coating Line # 6 and its coating preparation equipment shall not exceed 3,358 tons per year, calculated as the sum of each 12 consecutive month period.  
(9 VAC 5-80-1180)
12. **Requirements by Reference** - Except where this permit is more restrictive than the applicable requirement, the NSPS equipment as described in Condition 1 shall be operated in compliance with the requirements of 40 CFR 60, Subpart TT.  
(9 VAC 5-80-1180, 9 VAC 5-50-400 and 9 VAC 5-50-410)

13. **Requirements by Reference** - Except where this permit is more restrictive than the applicable requirement, the MACT equipment as described in Condition 1 shall be operated in compliance with the requirements of 40 CFR 63, Subpart SSSS.  
(9 VAC 5-80-1180, 9 VAC 5-60-90 and 9 VAC 5-60-100)
14. **Requirements by Reference** - In such areas where requirements of 40 CFR 60.460 et seq. (NSPS Subpart TT) and 40 CFR 63.5080 et seq. (MACT Subpart SSSS) may create a conflict, MACT Subpart SSSS is deemed to be the prevailing regulation.  
(9 VAC 5-170-160)
15. **Facility or Control Equipment Malfunction - Hazardous Air Pollutant Processes** - Metal coil coating Line # 6 shall shut down immediately if they are unable to meet the applicable emission standards, and shall not return to operation until they are able to operate in compliance with the applicable emission standards.  
(9 VAC 5-20-180 F 2)

#### **EMISSION LIMITATIONS**

16. **Emission Limits** - Emissions from the operation of the coating preparation equipment and metal coil coating Line # 6 shall not exceed the limits specified below:
- |                            |             |               |
|----------------------------|-------------|---------------|
| Volatile Organic Compounds | 15.4 lbs/hr | 67.16 tons/yr |
|----------------------------|-------------|---------------|
- (9 VAC 5-50-260 and 9 VAC 5-60-300)
17. **Visible Emission Limit** - Visible emissions from metal coil coating Line # 6 shall not exceed five percent (5 %) opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).  
(9 VAC 5-80-1180 and 9 VAC 5-50-260)

#### **CONTINUING COMPLIANCE DETERMINATION**

18. **Stac Tests** - Upon request by the DEQ, the permittee shall conduct performance tests for Volatile Organic Compounds from the coating preparation equipment and/or metal coil coating Line # 6 to demonstrate compliance with the emission limits and control efficiency requirements contained in this permit. The details of the tests shall be arranged with the Air Compliance Manager, West Central Regional Office.  
(9 VAC 5-50-30 G)
19. **Visible Emissions Evaluation** - Upon request by the DEQ, the permittee shall conduct visible emission evaluations from metal coil coating Line # 6 to demonstrate compliance with the visible emission limits contained in this permit. The details of the tests shall be arranged with the Air Compliance Manager, West Central Regional Office.  
(9 VAC 5-50-30 G)

## **RECORDS**

20. **On Site Records** - The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Air Compliance Manager, West Central Regional Office. These records shall include, but are not limited to:

- a. Monthly and annual VOC throughput in tons for metal coil coating Line # 6 and its coating from the coating preparation equipment. Annual throughput shall be calculated as the sum of each consecutive 12 month period.
- b. Monthly and annual VOC emissions in tons from metal coil coating Line # 6 including its coating preparation equipment. Annual emissions shall be calculated as the sum of each consecutive 12 month period.
- c. Temperature records of the Line # 6A catalytic oxidizer upstream of the catalyst bed.
- d. Monitoring records for the catalyst bed.
- e. Temperature records of the Line # 6B thermal oxidizer near the combustion chamber exit.
- f. Once per shift records of the negative pressure of the Line # 6 enclosure(s) and any additional records specified in the monitoring plan.
- g. Results of all stack tests, visible emission evaluations and performance evaluations.
- h. Monitoring system calibrations and calibration checks.
- i. Material Safety Data Sheets (MSDS), Certified Product Data Sheets (CPDS) or other vendor information approved by VDEQ showing VOC content, HAP content, water content, and solids content for each coating used.
- j. Scheduled and unscheduled maintenance, and operator training.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

(9 VAC 5-80-1180 and 9 VAC 5-50-50)

## **GENERAL CONDITIONS**

21. **Right of Entry** - The permittee shall allow authorized local, state, and federal representatives, upon the presentation of credentials:

- a. To enter upon the permittee's premises on which the facility is located or in which any records are required to be kept under the terms and conditions of this permit



- b. To have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit or the State Air Pollution Control Board Regulations
- c. To inspect at reasonable times any facility, equipment, or process subject to the terms and conditions of this permit or the State Air Pollution Control Board Regulations and
- d. To sample or test at reasonable times.

For purposes of this condition, the time for inspection shall be deemed reasonable during regular business hours or whenever the facility is in operation. Nothing contained herein shall make an inspection time unreasonable during an emergency.

(9 VAC 5-170-130 and 9 VAC 5-80-1180)

**22. Maintenance/Operating Procedures** – At all times, including periods of start-up, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate the affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions. The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment and process equipment which affect such emissions:

- a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
- b. Maintain an inventory of spare parts.
- c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
- d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures, prior to their first operation of such equipment. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.

(9 VAC 5-50-20 E and 9 VAC 5-80-1180 D)

**23. Record of Malfunctions** – The permittee shall maintain records of the occurrence and duration of any bypass, malfunction, shutdown or failure of the facility or its associated air pollution control equipment that results in excess emissions for more than one hour. Records shall include the date, time, duration, description (emission unit, pollutant affected, cause), corrective action, preventive measures taken and name of person generating the record.

(9VAC 5-20-180 J and 9 VAC 5-80-1180 D)

24. **Notification for Facility or Control Equipment Malfunction** - The permittee shall furnish notification to the Air Compliance Manager, West Central Regional Office of malfunctions of the affected facility or related air pollution control equipment that may cause excess emissions for more than one hour, by facsimile transmission, telephone, or telegraph. Such notification shall be made as soon as practicable but no later than four daytime business hours after the malfunction is discovered. The permittee shall provide a written statement giving all pertinent facts, including the estimated duration of the breakdown, within two weeks of the discovery of the malfunction. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the permittee shall notify Air Compliance Manager, West Central Regional Office in writing.  
(9 VAC 5-20-180 C and 9 VAC 5-80-1180)
25. **Violation of Ambient Air Quality Standard** - The permittee shall, upon request of the DEQ, reduce the level of operation or shut down a facility, as necessary to avoid violating any primary ambient air quality standard and shall not return to normal operation until such time as the ambient air quality standard will not be violated.  
(9 VAC 5-20-180 I and 9 VAC 5-80-1180)
26. **Permit Suspension/Revocation** - This permit may be suspended or revoked if the permittee:
- a. knowingly makes material misstatements in the permit application or any amendments to it
  - b. Fails to comply with the conditions of this permit
  - c. Fails to comply with any emission standards applicable to a permitted emissions unit
  - d. Causes emissions from the stationary source which result in violations of , or interfere with the attainment and maintenance of, any ambient air quality standard or
  - e. Fails to operate in conformance with any applicable control strategy, including any emission standards or emission limitations, in the State Implementation Plan in effect at the time an application for this permit is submitted.
- (9 VAC 5-80-1210 F)
27. **Change of Ownership** - In the case of a transfer of ownership of a stationary source, the new owner shall abide by any current permit issued to the previous owner. The new owner shall notify the Director, West Central Regional Office of the change of ownership within 30 days of the transfer.  
(9 VAC 5-80-1240)
28. **Registration/Update** - Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate a prompt response by the permittee to requests by the DEQ or the Board for information to include, as appropriate: process and production data changes in control equipment and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact. The availability

of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, 2.1-340 through 2.1-348 of the Code of Virginia, 10.1-1314 (addressing information provided to the Board) of the Code of Virginia, and 9 VAC 5-170-60 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information.

(9 VAC 5-170-60 and 9 VAC 5-20-160)

29. **Permit Copy** - The permittee shall keep a copy of this permit on the premises of the facility to which it applies.

(9 VAC 5-170-160)